

HOWREY
LLP

525 Market Street
Suite 3600
San Francisco, CA 94105-2708
T 415.848.4900
F 415.848.4999
www.howrey.com
File 06816.0060.000000

September 1, 2006

Via E-Filing

Hon. Edward M. Chen
Magistrate Judge
United States District Court
Northern District of California
450 Golden Gate Avenue
Courtroom C, 15th Floor
San Francisco, CA 94102

**Re: *Synopsys v. Ricoh Company, Ltd.*,
Case No. C03-2289 MJJ (EMC)
Ricoh Company, Ltd. V. Aeroflex, Inc., et al.
Case No. C03-4669 MJJ (EMC)**

Dear Judge Chen:

We write to seek a clarification regarding two contradictory Court orders entered this afternoon regarding Ricoh's pending motion for protective order (Synopsys Dkt. Nos. 447 & 448). Dkt. No. 447 orders the parties to abide by the Defendants' proposed language; Dkt. No. 448, however, orders the parties to abide by Ricoh's proposed language (and does not reference Dkt. No. 447 in any way). Defendants respectfully request the Court issue an amended order to make clear which order it intended to enter.¹

Respectfully yours,



Ethan B. Andelman

EBA:sg

¹ Should Dkt. No. 447 be the intended order, Defendants note a minor inconsistency in the order. In the prefatory language of the order, the Court states that it found the limitations offered by Defendants, including the limitation that documents be "created by or for Dr. Papaefthymiou" to be reasonable. However, in the points following, the order reads that the documents must be "authored by Dr. Papaefthymiou." Based on the prefatory language, Defendants believe this language should read "authored by or for Dr. Papaefthymiou." Should Dkt. No. 447 be the intended order, clarifying this scope will allow the parties to understand precisely the bounds of the Court's order.